

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No. 2:21-cr-00079
)	
SUSAN GILBERT)	

MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

COMES NOW Defendant Susan Gilbert, by and through her undersigned counsel, who files this Motion for Extension of Time to File Pretrial Motions and states the following in support thereof.

1. The Government has no objection to this motion as communicated by Assistant United States Attorney Karen Gal-Or.
2. The Arraignment in this matter was held on March 17, 2021.
3. By order entered March 17, 2021, the Court granted the Oral Motion for Extension of Time to File Pretrial Motions and directed any pretrial motions referred to in Local Criminal Rule 12 are due on or before May 3, 2021.
4. On March 17, 2021, the Government provided Defendant with Rule 16 Discovery.
5. On April 9, 2021, the Government provided Defendant with Rule 16 Supplemental Discovery.
6. Defendant has been diligent in the initial review of discovery and investigation of this case but requests additional time to prepare pretrial motions.
7. Defendant requests an extension of time of 30 days to file pretrial motions.
8. Defendant understands that any extension of time to file pre-trial motions is deemed excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(1)(D).

WHEREFORE, Defendant respectfully requests this Honorable Court enter an order granting an extension of time of 30 days to file pretrial motions.

Respectfully submitted,

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Dated: April 29, 2021